

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**DECLARATION OF DAVID D. CROSS IN SUPPORT OF CURLING  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, David D. Cross, declare as follows:

1. I am a member of the bars of the State of New York and the District of Columbia. I am a partner with the law firm of Morrison & Foerster LLP, representing Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the "Curling Plaintiffs") in the above-captioned matter. I have been admitted *pro hac vice* in these proceedings. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

2. The documents attached as exhibits to this Declaration are true and correct copies of documents cited in the contemporaneously filed Curling Plaintiffs' Memorandum in Support of Motion for Preliminary Injunction.

3. Attached as Exhibit 1 to this Declaration is a true and correct copy of State Defendants' Objections and Responses to Plaintiffs' Second Joint Request for Production of Documents and Inspection of Things, dated August 18, 2020.

4. Attached as Exhibit 2 to this Declaration is a true and correct copy of the Master Solution Purchase and Services Agreement by and between Dominion Voting Systems, Inc. and the Secretary of State of the State of Georgia (July 29, 2019), Exhibit B to which (the Dominion Solution Order) is referred to in the Memorandum as the "Contract."

5. Attached as Exhibit 3 to this Declaration is a true and correct copy of the DEF CON 27 Voting Machine Hacking Village Report (Sept. 26, 2019), referred to in the Memorandum as the "DEF CON Report."

6. I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 19th day of August in Alexandria, VA.

/s/ David D. Cross  
David D. Cross